

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

DEC 15 2011

DAVID J. MALAND, CLERK
BY
DEPUTY _____

UNITED STATES OF AMERICA

§
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§
§
§

v.

NO. 4:11CR 237
(Judge Schell)

DANISH SALEEM

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2252(a)(4)(B)
and (b)(2) (Possession of Child
Pornography)

On or about November 17, 2011, in the Eastern District of Texas, **Danish Saleem**, defendant, did knowingly possess matter, specifically an Sony VAIO laptop with a Toshiba hard drive, that contained more than one visual depiction of sexually explicit conduct of minors that had been mailed, shipped and transported in interstate and foreign commerce, by any means, including by computer, and which were produced using materials that had been mailed, transported, and shipped in interstate and foreign commerce.

Included in the images possessed by **Saleem** were the following:

COMPUTER FILE NAME	DESCRIPTION
LC-46562.jpg	An image depicting a prepubescent female with her mouth open, while an adult male squirts a liquid from his penis into her mouth.
LC-16588.jpg	An image depicting a prepubescent female performing oral sex on an adult male.
LC-16587.jpg	An image depicting a prepubescent female with an adult penis in her hand.
LC-16535.jpg	An image depicting a prepubescent female's genitalia while an adult inserts a finger into her anus.
LC-46561.jpg	An image depicting a prepubescent female performing oral sex on an adult male.
LC-154016.jpg	An image depicting the lewd and lascivious display of a prepubescent female's genitalia.
LC-51037.jpg	An image depicting the lewd and lascivious display of a prepubescent female's genitalia.

The production of such visual depictions involved the use of minors engaging in sexually explicit conduct and such depictions were of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2).

Notice of Intent to Seek Criminal Forfeiture

As the result of committing the offenses alleged in this Indictment, **Saleem** shall forfeit to the United States his interest in the following property, including, but not limited to:

1. Sony VAIO laptop computer (Serial # 275148453002135);

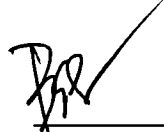
2. Toshiba hard drive (Serial # Y9EHC2VBT); and
3. Seagate external hard drive (Serial # 9QF4Q6MX).

This property is forfeitable pursuant to 18 U.S.C. § 2253(a) based upon the property being:

- (1) any visual depiction described in section . . . 2252 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; or
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

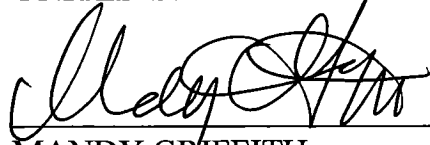
By virtue of the commission of the offenses alleged in this Indictment, any and all interest the defendant has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. § 2253.

A TRUE BILL



GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Mandy Griffith', written over a horizontal line.

MANDY GRIFFITH
Assistant United States Attorney

12/14/11

Date

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v.

DANISH SALEEM

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NO. 4:11CR_____
(Judge _____)

NOTICE OF PENALTY

Count One

Violation:

18 U.S.C. § 2252(a)(4)(B) and (b)(2)
Possession of Child Pornography

Penalty:

Imprisonment for not more than ten years; but if the defendant has a prior conviction under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than ten years and not more than twenty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$100.00